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10 UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
[San Francisco Division]

12  
13 MANI SUBRAMANIAN, as an individual  
etc.,

14 Plaintiff,

15 vs.  
16

17 ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY, et al. (including  
18 QAD INC., a Delaware Corporation with  
principal place of business in California; JOHN  
DOORDAN, an individual and citizen of  
19 California; LAI FOON LEE, an individual and  
citizen of California; ROLAND DESILETS, an  
20 individual and citizen of New Jersey; and,  
WILLIAM D. CONNELL, an individual and  
21 citizen of California),

22 Defendants.  
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Case No. 08-cv-1426-VRW [ECF]

Date: October 9, 2008

Time: 2:30 p.m.

Dept: Courtroom 6

Judge: Hon. Vaughn R. Walker

24 **NOTICE OF JOINDER AND JOINDER BY DEFENDANTS**  
25 **QAD INC., WILLIAM D. CONNELL, JOHN DOORDAN, AND LAI FOON LEE**  
26 **IN ST. PAUL'S MOTION TO**  
27 **DECLARE PLAINTIFF MANI SUBRAMANIAN**  
28 **A VEXATIOUS LITIGANT [Docket No. 22]**

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that, on October 9, 2008, at 2:30 p.m., or as soon thereafter as the matter may be heard, before The Hon. Vaughn R. Walker, in Courtroom No. 6, on the 17<sup>th</sup> Floor, United States District Courthouse, 450 Golden Gate Avenue, San Francisco, California 94102, defendants QAD INC., JOHN DOORDAN, LAI FOON LEE, and WILLIAM D. CONNELL (collectively "QAD-Related Defendants") will and hereby do join in the Motion filed in the above-captioned matter by defendant St. Paul Fire & Marine Insurance Company ("St. Paul") [Docket Nos. 22 and 28] for an Order declaring that Plaintiff Mani Subramanian ("Subramanian") is a vexatious litigant and for a pre-filing order, pursuant to 28 U.S.C. § 1651, requiring Subramanian to obtain the approval of the Court for the filing of any future action or motion relating to the subject matters specified in St. Paul's Motion.

The QAD-Related Defendants make this Joinder based on this Notice of Joinder, the Notice of Motion, Memorandum of Points and Authorities, and Request for Judicial Notice filed by St. Paul in support of its Motion [Docket Nos. 22 and 28], and on such further argument and evidence, written or oral, as the Court may entertain upon the consideration of this matter.

Dated: September 4, 2008

WILLIAM D. CONNELL  
SALLIE KIM  
GCA LAW PARTNERS LLP

By: William D. Connell.  
William D. Connell

By: Sallie Kim.  
Sallie Kim

Attorneys for Defendants QAD Inc.,  
John Doordan, Lai Foon Lee, and  
William D. Connell